



Park 80 West-Plaza One  
250 Pehle Avenue  
Suite 401  
Saddle Brook, NJ 07663

(201) 845-9600 Main  
(201) 845-9423 Fax

Matthew F. Gately, Esq.  
mfg@njlawfirm.com  
Direct Line: (551) 497-7189

September 20, 2024

**VIA ECF**

Hon. Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks of September 9 and September 16:

- **Initial Disclosures.** Beginning on August 20, Defendants sent correspondence to Plaintiffs in the MDL regarding alleged/perceived deficiencies in their initial disclosures. The parties continue to meet and confer.
- **State Attorney General Track Proposed Fact Sheet.** Given the Court's order (ECF 278), Defendants are today providing the State Attorney General Plaintiffs with a response to the State's May 30 PFS draft. The parties plan to meet and confer early next week and will update the Court as to their status by September 30.

The parties thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ Matthew F. Gately

Matthew F. Gately  
Liaison Counsel for  
Class Action Track

/s/ David R. Buchanan

David R. Buchanan  
Liaison Counsel for  
Self-Funded Payer Track

/s/ Joanne Cicala

Joanne Cicala  
Liaison Counsel for  
The State Attorneys General Track

/s/ John D. Tortorella

John D. Tortorella

cc: All counsel of record (via ECF)